

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al;)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	FILE NO: 1:17cv02989-AT
BRAD RAFFENSBERGER, et al.;)	
)	
)	
Defendants.)	
)	
)	

**MEMBERS OF THE FULTON COUNTY BOARD OF REGISTRATION
AND ELECTIONS, MARY CAROLE COONEY, VERNETTA NURIDDIN,
DAVID J. BURGE, STAN MATARAZZO, MARK WINGATE AND AARON
JOHNSON’S MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS’ MOTIONS FOR ATTORNEY’S FEES**

Pursuant to Local Rule 7.1(B) and Local Rule 54.2(A)(2), as well as Part III (a) of this Court’s Standing Order, the Members of the Fulton County Board of Registration and Elections, Mary Carole Cooney, Vernetta Nuriddin, David J. Burge, Stan Matarazzo, Mark Wingate and Aaron Johnson move the Court for permission to file their Responses to Plaintiffs’ Motions for Attorneys’ Fees and Costs thirty (30) days from the date on which Plaintiffs provide supporting documentation for their motions. (The current response briefs are due Thursday,

September 12, 2019). In support of this Motion, Mary Carole Cooney, Vernetta Nuriddin, David J. Burge, Stan Matarazzo, Mark Wingate and Aaron Johnson state as follows:

1. The Coalition Plaintiffs filed their Special Motion for Award of Attorneys' Fees and Costs on August 29, 2019. [Doc. 595].

2. A short time later on the same date, the Curling Plaintiffs also filed a Special Motion for Award of Attorneys' Fees and Costs. [Doc. 596].

3. Currently, a response to each is due on Thursday, September 12, 2019.

4. Pursuant to Local Rule 54.2, each group of Plaintiffs has indicated that they will be filing detailed specification, itemization and affidavits in support of their requests for fees, within thirty days of the filing of their motions. (*See* Doc. 595 at p. 2 and Doc. 596 at ¶ 5). This filing is required by September 28, 2019.

5. These Defendants hereby requests 30 days, from the time of the filing of Plaintiffs, supporting documentation, by which to file their responses to Plaintiffs' Motions for Attorneys' Fees and Costs, in order to thoroughly and appropriately review and respond to Plaintiffs' Motions and documentation.

6. This is the first time a request has been made for an extension to respond to Plaintiffs' Motions. No party would be prejudiced in any respect by the

entry of an Order extending this time period. Furthermore, the requested extension will cause no burden on the Court.

For all of the reasons discussed herein, it is respectfully requested that these Defendants' Responses be due thirty (30) days from the date on which Plaintiffs provide supporting documentation for their motions.

Respectfully submitted this 11th day of September, 2019.

**OFFICE OF THE COUNTY
ATTORNEY**

/s/David R. Lowman

Kaye Burwell

Georgia Bar Number: 775060

kaye.burwell@fultoncountyga.gov

Cheryl Ringer

Georgia Bar Number: 557420

cheryl.ringer@fultoncountyga.gov

David Lowman

Georgia Bar Number: 460298

david.lowman@fultoncountyga.gov

**ATTORNEYS FOR
DEFENDANTS RICHARD
EVANS MARY CAROLE
COONEY, VERNETTA
NURIDDIN, DAVID J. BURGE,
STAN MATARAZZO, AARON
JOHNSON, AND THE FULTON
COUNTY BOARD OF
REGISTRATION & ELECTIONS**

Office of the County Attorney

141 Pryor Street, S.W.

Suite 4038

Atlanta, Georgia 30303

CERTIFICATE OF SERVICE

I hereby certify that on this date I have electronically filed the foregoing **MARY CAROLE COONEY, VERNETTA NURIDDIN, DAVID J. BURGE, STAN MATARAZZO, MARK WINGATE AND AARON JOHNSON'S MOTION FOR EXTENSION OF TIME** with the Clerk of Court using the CM/ECF system, with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 11th day of September, 2019.

/s/ David R. Lowman

Georgia Bar Number: 460298

david.lowman@fultoncountyga.gov